

**Region 2 NPDES Prioritization for Real-time Reviews of Individual Permits  
Fiscal Year 2018**

The EPA is responsible for ensuring that delegated states correctly implement federal regulation and guidance in NPDES permits. In Region 2, the delegated states are New York, New Jersey and the US Virgin Islands. Real-time permit reviews are an important tool to ensure the states are meeting their commitments and issuing permits that are protective of human health and the environment. The goal of this prioritization scheme is to ensure that R2 conducts real-time reviews for facilities likely to have the most environmental impact. The prioritization scheme should be updated at the beginning of every fiscal year to address current national and state-specific elements, although additional updates may be necessary.

There is no specific number of “yes” responses that deems a permit a priority. The Regional goal is to review one permit per state each month. This prioritization scheme will help permit staff determine which draft permits should be reviewed.

<b>Draft Permit Information</b>			
NPDES Number:	NY0002585	Reviewer Name:	S.Pylypchuk
Permit Name:	Fleischmann’s Vinegar	Date:	1.10.18

<b>General Priorities</b>		<b>Yes</b>	<b>No</b>
1.	Is this facility a major discharger? <i>Available in ICIS or draft permit</i>	X	
2.	Does this facility have/discharge to: Cooling water intake? Coal combustion residue/flue gas desulfurization? Waters with nutrient concerns (LIS, Barnegat Bay, etc)? CSOs, SSOs, bypassing? Drydocks? Salt piles?		X
3.	Does the facility discharge to impaired waters? <i>Available in How’s My Waterway, ATTAINS or ECHO</i>		X
4.	Does the discharge include a pollutant that contributes to the impairment? <i>Available in draft permit or best professional judgment</i>		na
5.	Does the receiving water have a completed TMDL? <i>Available in How’s My Waterway or ATTAINS</i>		na
6.	Is the facility subject to any federal effluent limitation guidelines (ELG) which has been revised in the last 10 years?		X
7.	Is there public interest? Community or environmental group opposition?		X

*Updated: November 7, 2017*

8.	Does this permit allow backsliding or include an antidegradation analysis?  <b>Flow weighted UOD and temperature limits established to allow for year-round discharge and increase in production capacity</b>	X	
9.	Is the facility within an environmental justice community of concern? <i>Available in EJScreen for NY and NJ (&gt; 80% compared to US overall)</i>		
10.	Does the draft permit include a limitation for a water quality standard that has been revised within the last 10 years?		X
11.	Is the facility in significant non-compliance? <i>Available in ECHO</i>		X
<b>New York State Priorities</b>		<b>Yes</b>	<b>No</b>
1.	Is the discharge to: Trout waters? Great Lakes Watershed?  <b>Two outfalls to trout waters</b>	X	
3.	Is the facility within a NY Making a Visible Difference community? Newburgh, NY Akwesasne, NY – St. Regis Mohawk Tribe		X
<b>New Jersey Priorities</b>		<b>Yes</b>	<b>No</b>
1.	Is this facility within the Delaware River watershed?		
2.	Is the facility within a NJ Making a Visible Difference community? Newark, NJ Camden, NJ		
<b>US Virgin Islands Priorities</b>		<b>Yes</b>	<b>No</b>
	Not applicable. All draft TPDES permit are priority.		

<b>Prioritization Determination</b>	<b>Yes</b>	<b>No</b>
Is this permit a priority for review?		X
Comments:  No issues stood out during completion of this checklist.		